

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - : INFORMATION

AHMED ABASSI, : S1 13 Cr. 304 (MGC)

Defendant. :

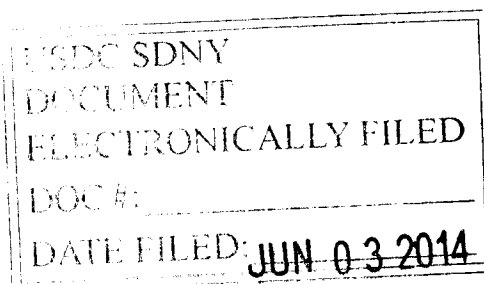
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COUNT ONE

The United States Attorney charges:

1. On or about March 18, 2013, in the Southern District of New York and elsewhere, AHMED ABASSI, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully did falsify, conceal, and cover up by trick, scheme, and device a material fact and did make materially false, fictitious, and fraudulent statements and representations, to wit, ABASSI falsely informed government officials at John F. Kennedy International Airport that he had traveled to the United States to work in a real-estate business.

(Title 18, United States Code, Section 1001.)




COUNT TWO

The United States Attorney further charges:

2. In or about April 2013, in the Southern District of New York and elsewhere, AHMED ABASSI, the defendant, did attempt to knowingly possess an identification document (other than one issued lawfully for the use of the possessor), authentication feature, and false identification document, to wit, ABASSI knowingly made false representations on an immigration application in order to obtain a United States Government-issued Green Card, with the intent such document and feature would be used to defraud the United States.

(Title 18, United States Code, Sections 1028(a)(4) and 1028(f).)


PREET BHARARA
United States Attorney

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(18 U.S.C. §§ 1001 & 1028(f))

Preet Bharara
United States Attorney
